

From: [Moore, Gary](#)
To: [Jonathan Carroll](#)
Cc: [Moran, Gloria](#); [Arredondo Alonzo](#); [Mueller, Brian](#)
Subject: Falcon Refinery:
Date: Wednesday, September 11, 2013 11:56:19 AM

Jonathan:

You may want to look at these options. I have not checked to see if they are CERCLA approved facilities under our Offsite Disposal Rule. I am sure that most of them probably are though. They may not be able to tell you much if you don't have a profile of your waste (talk to Alonzo). At a **minimum**, the sludge will be K169 (Crude Oil Tank Bottom Sludges). The liquids may be able to be handled differently (used oil for the oils, waters may be able to be treated).

Clean Harbors Deer Park, LLC
Service Type: Incinerators
EPA ID: TXD055141378
2027 Independence Parkway South
La Porte, TX 77571
Phone: 281.930.2300
Fax: 281.930.2427

U.S. Ecology - Thermal Desorption
Petronila Road 3.5 miles S. of Robstown
Robstown, TX 78380
EPA ID: TXD069452340
(512) 387-3518
800.242.3209

Veolia Environmental Services
Port Arthur TSDF
Incineration
Service & Sales Center
Highway 73, 3.5 miles west of Taylors Bayou
Port Arthur, TX 77640
United States
409.736.2821
800.577.2876 - Toll Free

DuraTherm, Inc.
2700 Avenue S
San Leon, Texas 77539
Telephone: 281.339-1352



9597273

Gary Moore

Federal On-Scene Coordinator

U.S. EPA Region 6

214-789-1627 cell

214-665-6609 office

moore.gary@epa.gov

From: Jonathan Carroll <jcarroll@lazarusenergy.com>

Sent: Tuesday, September 10, 2013 7:32 PM

To: Moore, Gary

Cc: Moran, Gloria

Subject: Re: Used / Waste Material

It was never our intention to use this group without your approval and TRC's oversight. I only forwarded you a solicitation that I received today. Again, we have no plans to do any removal of any material without TRC's oversight and your approval. I will call you in the morning to discuss.

Regards,

Jonathan Carroll

Sent from my iPhone

On Sep 10, 2013, at 6:41 PM, "Moore, Gary" <Moore.Gary@epa.gov> wrote:

Jonathan:

This company is not TRC and is not authorized under the Administrative Order to provide management this project. In fact, LTR1 is also not authorized to provide management of this project.

The sludge waste in the tanks is at a minimum a K169 hazardous waste in addition to any additional RCRA characteristics that it may possess. LTR1, Lazarus Energy Holdings, has not shown that it has the ability to to comply with the Order.

The approved Project Manager is Steve Halasz and TRC and any change has to be approved by me. The waste has to be disposed of at a CERCLA Approved facility and one has to be proposed and then I check to see if it is an approved facility. TRC knows this process.

You best option is to get TRC back involved in the process.

Thanks

Gary Moore

Federal On-Scene Coordinator

U.S. EPA Region 6
214-789-1627 cell
214-665-6609 office
moore.gary@epa.gov

From: Jonathan Carroll <jcarroll@lazarusenergy.com>
Sent: Tuesday, September 10, 2013 5:44 PM
To: ajm@bbbtanksvc.com
Cc: Moore, Gary
Subject: Fwd: Used / Waste Material

FYI

Sent from my iPhone

Begin forwarded message:

From: "Kim Tindol" <kim@providencemanagementllc.com>
Date: September 10, 2013, 3:31:
Subject: Used / Waste Material

My name is Austin Tindol with Providence Management LLC . We help companies manage and dispose of their waste/used petroleum material. We can handle any used compressor oils, hydraulic oils, slop oils, drip gases, Glycols(Ethylene, Tri-Ethylene, etc.) that your facility may have or use. All of the material will be picked up from your facility and will be delivered to one of our recycling facilities at no charge to you, depending on the percentage of the product. I would like the opportunity to help provide your company, our services on disposing any of your waste product for your facility.

We are registered with ISNetworld. Our ISN # is 400-200897 – Providence Management LLC.

Thank you so much for you time and the opportunity to serve you and your company.

Austin Tindol
Providence Management, LLC
459 Providence Lane
Bluemont, VA 20135
Office: (757) 327-9141
Fax: (866) 729-1963
www.providencemanagementllc.com

James 1:27

Pure religion and undefiled before God and the Father is this,
To visit the fatherless and widows in their affliction,
and to keep himself unspotted from the world